

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
	§	
vs.	§	Crim. No. 2:17-CR-390(1)
	§	
DAVID KEITH WILLS	§	

**OFFER OF PROOF**

Defendant David Wills would respectfully submit the attached Rough Draft Portion of the trial transcript of the proceedings on October 2, 2019, where before the jury Counsel for the Government asked Defense witness Dr. Doyle the following question:

***“Q: Is there any evidence that Jane Doe has been watching porn?”***

*See* p. 41, l. 20 – 21, Rough Draft Daily Copy of transcript of proceedings, October 2, 2019 (emphasis supplied), attached as Exhibit 1.

Accordingly, in answer to that question propounded before the jury, Government counsel has opened the door to evidence that Jane Doe visited porn sites and sexually explicit content contained on her own personal telephone device, which, for four years, she had claimed she did not possess. *See Defendant’s Bench Memorandum [Curative Admissibility]*.

Respectfully Submitted,

By: /s/ Gerald H. Goldstein

Gerald H. Goldstein

CYNTHIA E. ORR\*

Bar No. 15313350

GERALD H. GOLDSTEIN

Bar No. 08101000

ABASI D. MAJOR

Bar No. 24096504

DEBRAL. INNOCENTI

Bar No. 24046135

DESTINEE N. RUSSELL

Bar No. 24096406

JOHN S. GILMORE, III

Bar No. 24096676

GOLDSTEIN & ORR

310 S. St. Mary's St. 29th Fl.

San Antonio, Texas 78205

210-226-1463 phone

210-226-8367 facsimile

Email: whitecollarlaw@gmail.com

Email: ggandh@aol.com

Email: abasi.major@gmail.com

Email: debraplacette@gmail.com

Email: drussell.ggho@gmail.com

Email: johnstuartgilmore@gmail.com

JOHN T. HUNTER

Bar No. 24077532

HUNTER, LANE & JAMPALA

310 S. St. Mary's St., Suite 1740

San Antonio, Texas 78205

210-202-1076 phone

210-880-6162 facsimile

Email: john@hljdefense.com

JOHN S. GILMORE

Bar No. 07958500

622 South Tancahua

Corpus Christi, Texas 78401

361-882-4378 phone

361-882-3635 facsimile

Email: gilmorelaw@msn.com

RENE RODRIGUEZ

Bar No. 17148400

433 S. Tancahua St.  
Corpus Christi, Texas 78401  
361-815-3888 phone  
361-882-1919 facsimile  
Email: rene.rodriguez@rdrlaw.com

TERRY W. SHAMSIE  
Bar No. 18089800  
LAW OFFICE OF TERRY W. SHAMSIE  
4002 Castle Valley Dr.  
Corpus Christi, TX 78410  
361-960-6300 phone  
E-mail: Terryshamsie@hotmail.com

RICHARD FELDMAN  
District of Columbia Bar No. 399259  
PO Box 340  
Rindge, NH 03461  
(609) 930-6444 phone  
Email: mls@usa.net

DANTE E. DOMINGUEZ  
Bar No. 24086677  
Law Office of Dante Eli Dominguez  
6243 Interstate Hwy 10, Suite 503  
San Antonio, Texas 78201  
210-227-9399-1463 phone  
210-855-1863 facsimile  
Email: ddominguez.law@gmail.com

Attorneys for Defendant,  
DAVID KEITH WILLS  
\*Lead Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been electronically

delivered to Assistant United States Attorney Zahra Fenelon, as a registered participant to CM/ECF document filing system, and by email to Zahra.fenelon@usdoj.gov on this 2nd day of October 2019.

By: /s/ Gerald H. Goldstein  
Gerald H. Goldstein

**CERTIFICATE OF CONSULTATION**

This is memorandum is bring prepared at night during trial and will advise the court, however the Undersigned Counsel assumes without speaking to the Government that they are opposed to this motion.

By: /s/ Gerald H. Goldstein  
Gerald H. Goldstein